

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

Jeffrey Cordtz,
Plaintiff

Case No. 1:21-cv-02003-MHC-LTW

Versus

**Johnson Legal Offices, LLC;
FCI Lender Services, Inc.;**
And Larry W. Johnson

Defendants

**MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE A
MOTION FOR SUMMARY JUDGMENT AND TO RESPOND TO
DEFENDANT’S JOHNSON LEGAL OFFICES, LLC’s (“JLO”) and LARRY
W. JOHNSON’s (“LWJ”) MOTION FOR SUMMARY JUDGMENT**

On Monday November 29, 2021, this Court held a discovery hearing concerning a fiercely contested issue in this case. That issue is whether debt collection is a regular or irregular part of JLO’s law practice. The FDCPA technically defines a debt collector as one “who *regularly* collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another”. See FDCPA definition Section 1692a(6). JLO collects debts for another, but does it do so regularly? JLO also filed a sprawling motion for summary

judgment after the discovery hearing claiming that they do not *regularly* collect debts for another.

Today, this Court entered an Order directing JLO and LWJ to produce records which directly go to the issue of whether debt collection is an irregular part of JLO's law practice:

The Johnson Defendants, however, shall provide Plaintiff with affidavits from Jauregui & Lindsey, LLC and Georgia Home Mortgage detailing the services performed, the amount paid, and the number of hours billed by the Johnson Defendants. The affidavits shall be provided fourteen days from the docket entry date of this Order.

Assuming JLO and LWJ provide the affidavits on December 16, Plaintiff requests up to and including December 30 to file an Opposition to JLO and LWJ's motion for summary judgment as well as to file his own motion for summary judgment. Currently, Plaintiff's motion for summary judgment is due on December 6, 2021 and Plaintiff's response to JLO and LWJ's motion for summary judgment is due December 20, 2021.

I have contacted Defendants and LWJ and JLO do not consent to this motion. And I have not yet heard back from FCI at the time of this filing.

WHEREFORE, Plaintiff requests until December 30, 2021 to respond to LWJ and JLO's Motion for Summary Judgment and until December 30, 2021 to file his own Motion for Summary Judgment.

Dated December 2, 2021

Respectfully submitted,
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